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September 1, 2020

VIA ECF

Hon. Jesse M. Furman
United States District Court Judge
United States District Court
Southern District of New York
Courtroom 2202
40 Centre Street
New York, NY 10007

Re: *Bluebird Reinsurance Company Ltd. V. Parkwest Advisors Group, LLC*, 20-cv-4481

Dear Judge Furman:

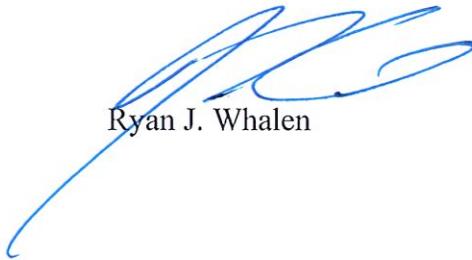
We represent Defendant, ParkWest Advisors Group, LLC (“ParkWest”) in the above-referenced litigation before this Court. We write pursuant to Your Honor’s Individual Practice Rule 1.A for two reasons.

First, to inform the Court that Sean Dougherty, the managing member of Parkwest, died in a tragic accident at his home on August 23, 2020. We are making efforts to confirm whether there are additional members of Parkwest and if there is a succession plan naming a managing member in the event of Mr. Dougherty’s death or incapacity. In any event, Mr. Dougherty’s death will likely impact the dates set forth in the Scheduling Order that was entered on Friday, August 21, 2020. Therefore, Defendant’ counsel requests a sixty (60) day stay of this action to provide counsel with the time necessary to determine who is ParkWest’s authorized representative. Plaintiff’s counsel does not object to this request.

Second, paragraph 9 of Parkwest’s answer filed on August 10, 2020 contains an error. Defendant requests leave to amend the answer to correct paragraph 9 to assert a general denial to paragraph 9 of the Amended Complaint. This would be the only amendment. Plaintiff’s counsel has consented to this request.

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Respectfully submitted,



Ryan J. Whalen

Application GRANTED in part. Instead of a stay, all deadlines are extended by two months, and the pretrial conference scheduled for January 26, 2021, is ADJOURNED to March 23, 2021, at 3:00 p.m. ParkWest is granted leave to file an amended answer, which it shall do by September 8, 2020. The Court extends its condolences to Mr. Dougherty's family and friends.

The Clerk of Court is directed to terminate ECF No. 23.

SO ORDERED.



September 2, 2020